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7 Attorneys for Defendants Romi Omar Mayder, Wesley Mayder, Silicon Test Systems, Inc., and
8 Silicon Test Solutions, LLC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VERIGY US, INC, a Delaware Corporation) **Civil Case No.: C07-04330 RMW (HRL)**

Plaintiff,

VS.

ROMI OMAR MAYDER, an individual,
WESLEY MAYDER, an individual,
SILICON TEST SYSTEMS, INC. a
California Corporation, SILICON TEST
SOLUTIONS, LLC, a California Limited
Liability Corporation, inclusive,

Defendants.

**DECLARATION OF KEVIN M.
PASQUINELLI IN SUPPORT OF
DEFENDANTS RESPONSE TO
ORDER TO SHOW CAUSE RE:
CONTEMPT**

Hearing Date: April 11, 2008
Time: 9:00 a.m.
Judge: Hon. Judge Whyte

PUBLIC VERSION

1 I, Kevin M. Pasquinelli, declare as follows:

2 1. I am an attorney with the law firm of Mount & Stoelker, P.C., counsel for Defendants Romi
3 Omar Mayder, Wesley Mayder, Silicon Test Systems, Inc., and Silicon Test Solutions, LLC. I have
4 personal knowledge of the facts set forth in this declaration and, if called upon to testify in this Court
5 as to those facts, my testimony would be as stated herein.

6 Timeline of Production of The RFQ

7 2. On or before 8/29/2007 Verigy Filed a Complaint in this matter attaching the Declaration of
8 Robert Pochowski ("Pochowski Declaration") in support thereof. The declaration itself is designated
9 "Confidential" under the Protective Order. Exhibit A to the Robert Pochowski declaration ("the
10 RFQ") is marked "Highly Confidential" under the protective order. Attached as Exhibit A is a true
11 and correct copy of the "Highly Confidential" version of Exhibit A to the Pochowski Declaration.

12 3. On or before 9/20/2007 Verigy produced documents in response to the Initial Requests for
13 Production of Documents propounded on Plaintiff by Defendants. Within this production is a second
14 copy of the RFQ which is designated "Highly Confidential" identified starting with Bates number
15 VER2209. Attached as Exhibit B is a true and correct copy of the RFQ produced at this time.

16 4. On or before 9/28/2007 Robert Pochowski produced documents in response to a *Subpoena*
17 *duces tecum* propounded on Mr. Pochowski by Defendants. Mr. Pochowski produced a copy of the
18 RFQ designated "Confidential" identified starting with Bates number POC000004. Attached as
19 Exhibit C is a true and correct copy of the RFQ produced at this time.

20 5. On 10/8/2007 Verigy produced documents, reduced in confidentiality designation. Attached
21 as Exhibit D is a true and correct copy of a letter from Melinda Morton, Esq, accompanying the
22 production of documents. In this production is the RFQ redesignated as "Confidential", a reduction
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1 from "Highly Confidential". Attached as Exhibit E is a true and correct copy of the RFQ, produced
2 at this time.

3 I declare, under penalty of perjury under the laws of the United States, the foregoing is true
4 and correct. Executed this 21st day of March, 2007 in San Jose, California.
5
6

7 Mount & Stoelker, P.C.
8 Kevin M. Pasquinelli

9 /s/
10 Attorney for Defendants Romi Mayder, Wesley Mayder, Silicon
11 Test Systems, Inc., and Silicon Test Solutions, LLC
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EXHIBITS A-E
FILED
UNDER SEAL